

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MINNESOTA**

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In re: Baycol Products Litigation

UNITED STATES OF AMERICA *ex rel.*  
LAURIE SIMPSON,

Honorable Michael J. Davis  
United States District Court Judge

*Plaintiff,*

v.

BAYER HEALTHCARE  
PHARMACEUTICALS, INC.;  
BAYER CORP.; and  
BAYER A.G.,

MDL No. 1431  
Civil No. 08-5758(MJD)(SER)

*Defendants.*

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**JOINT STATUS REPORT**

In accordance with the Court's January 18, 2019 Order (ECF No. 178), Relator Laurie Simpson ("Relator") and Defendants Bayer Healthcare Pharmaceuticals, Inc., Bayer Corp., and Bayer A.G. ("Bayer") (together, the "Parties"), respectfully submit the following joint status report.

Since the last Joint Status Report on September 17, 2019, the Parties have continued to make progress regarding discovery. On September 24, 2019, Bayer served a subpoena for documents on the Department of Defense and anticipates a response from the Department of Defense in the next few weeks. On September 27, 2019, Relator served her Responses and Objections to Bayer's First Request for Production of Documents. The Parties are scheduling a meet and confer to discuss the Responses and Objections. On October 2, 2019, Bayer made its first production of documents in response to Relator's Second Request for Production of

Documents and produced over 10,000 pages of documents responsive to Relator's various requests. Bayer is continuing to review documents that are potentially responsive to the Relator's Second Request for Production of Documents and anticipates making a second production of responsive documents by November 1, 2019.

At this time, the Parties do not believe that there are any discovery issues that require the Court's intervention. The Parties are available if the Court wishes to discuss the status of discovery at the conference scheduled for October 22, 2019. But in light of the foregoing, the Parties believe that the status conference may be postponed until November 26, 2019.

Dated: October 15, 2019

Respectfully submitted,

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Bayer Healthcare Pharmaceuticals, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on October 15, 2019, the foregoing document was served this day on all counsel of record via CM/ECF.

/s/ Caitlin L.D. Hull